

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No.: 7:23-CV-897**

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Pleading Relates to:)
)
ALL CASES.)
)
)

**PLAINTIFFS' MOTION FOR AN ORDER EXCLUDING CERTAIN OPINIONS OF
ALEXANDROS SPILIOPOULOS, PH.D.**

Pursuant to Federal Rule of Evidence 702, *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 609 U.S. 579 (1993), and the Court's Amended Pretrial Scheduling Order [DE-312], Plaintiffs hereby move the Court for an order excluding the opinions of expert Alexandros Spiliopoulos, Ph.D. regarding:

- ATSDR's uncertainty and sensitivity analyses;
- Section 3.3 of Dr. Spiliopoulos's report, titled "Timeline and Scientific Discourse on ATSDR's Camp Lejeune Water Modeling;"
- ATSDR's intent and purpose with respect to conducting its water modeling;
- How ATSDR's modeling results can or should be used by epidemiologists, doctors, or public health professionals;
- ATSDR's modeling approaches that were allegedly "cutting-edge" and/or still in the research stages;
- Contaminant losses during treatment;
- PCE source release start date at ABC One-Hour Cleaners; and
- "Erroneous" HP-634 concentration data.

Dr. Spiliopoulos's opinions on these topics should be excluded because they are unreliable, unsupported, and/or not proper expert witness testimony. In support of this motion, Plaintiffs submit and rely upon the accompanying Memorandum in Support and exhibits attached hereto.

WHEREFORE, Plaintiffs respectfully pray the Court orders as follows:

1. That the expert witness testimony of Dr. Spiliopoulos regarding the topics identified above is excluded.
2. For such other and further relief as the Court deems just and proper.

[Signature page to follow.]

DATED this 29th day of April 2025.

Respectfully submitted,

/s/ J. Edward Bell, III

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CERTIFICATE OF SERVICE

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 29th day of April 2025.

/s/ J. Edward Bell, III _____

J. Edward Bell, III